

Exhibit Q

ROSE COULTER-OWENS - 2/3/2015

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

ROSE COULTER-OWENS,
individually, and on behalf of all others
similarly situated,
Plaintiffs,

vs. Case No. 2:12-cv-14390-GCS-MKM

Hon. George C. Steeh

TIME, INC., a Delaware Corporation,
Defendant.

Deposition of ROSE COULTER-OWENS

Taken at 5353 Gateway Center

Flint, Michigan

Commencing at 9:33 a.m.

Tuesday, February 3, 2015

Before Denise M. Kizy, CSR-2466, RPR, CRR

Job No. WDC-026915

Pages: 1 - 240

1 APPEARANCES:

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3 BENJAMIN THOMASSEN

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10 Appearing on behalf of the Plaintiffs

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12 JEFFREY LANDIS

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19 Appearing on behalf of the Defendant

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1 Flint, Michigan

2 Tuesday, February 3, 2015

3 9:33 a.m.

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5 ROSE COULTER-OWENS,

6 was thereupon called as a witness herein, and after
7 having first been duly sworn to testify to the truth,
8 the whole truth and nothing but the truth, was
9 examined and testified as follows:

10 EXAMINATION

11 BY MR. LANDIS:

12 Q. Good morning, Ms. Coulter-Owens.

13 A. Good morning.

14 Q. Have you ever been deposed before?

15 A. No.

16 Q. So I'm going to go over some rules of the road for
17 today's deposition with you.

18 First, the court reporter is taking
19 everything down, so if you can try to answer my
20 questions verbally as opposed to nods or uh-huhs, that
21 would be better.

22 Can you try to do that?

23 A. Sure. No expressions will work.

24 Q. We'll also ask that you let me finish asking my
25 question before you answer, and I'll try to do the

1 renew her subscription."

2 Do you see that?

3 A. That's correct.

4 Q. Do you recall when in 2009 you subscribed to TIME
5 magazine?

6 A. One of those dark months. I think it was like
7 November or December, you know.

8 Q. Do you recall how long your subscription lasted?

9 A. It was for a year as far as I remember.

10 Q. Did you renew your subscription when it ended?

11 A. No.

12 Q. You were not a subscriber -- you're not currently a
13 subscriber to TIME magazine?

14 A. No.

15 Q. You're not a subscriber to any magazine published by
16 Time Inc.?

17 A. No.

18 Q. I'm sorry, I asked a bad question in kind of a double
19 negative way. So I'm just going to reask these
20 questions.

21 Are you currently a subscriber to TIME
22 magazine?

23 A. No.

24 Q. Are you currently a subscriber to any magazine
25 published by Time Inc.?

1 A. Not that I'm aware of. If it is, I'm canceling it
2 tomorrow. If you know about anything, let me know.

3 Q. Did you subscribe to any magazines published by Time
4 Inc. in 2014?

5 A. Not that I'm aware of.

6 Q. Did you subscribe to TIME magazine in 2014?

7 A. It's not coming to my house, so, no, I'm thinking I
8 didn't subscribe, if you guys know about it.

9 Q. Did you subscribe to TIME magazine in 2013?

10 A. No.

11 Q. Were you a subscriber to TIME magazine in 2012?

12 A. No, not to my knowledge.

13 Q. 2011?

14 A. Not to my knowledge, because it was only a
15 subscription from '9 to '10, so, no.

16 Q. To the best of your knowledge, have you subscribed to
17 any magazine published by Time Inc. since November of
18 2010 when your subscription ran out?

19 A. Not to my knowledge.

20 Q. Now if you can turn back to Exhibit D1 for a moment,
21 and if you go to page 16 of the complaint, you see
22 there's a bunch of numbers --

23 MR. THOMASSEN: Can I help her navigate?

24 MR. LANDIS: Of course.

25 THE WITNESS: I started from the back

1 CERTIFICATE

2 STATE OF MICHIGAN

3 COUNTY OF OAKLAND

4

5 I, DENISE M. KIZY, a Notary Public in and
6 for the above county and state, do hereby certify that
7 this deposition was taken before me at the time and
8 place hereinbefore set forth; that the witness was by
9 me first duly sworn to testify to the truth; that this
10 is a true, full and correct transcript of my
11 stenographic notes so taken; and that I am not
12 related, nor of counsel to either party, nor
13 interested in the event of this cause.

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22 _____
DENISE M. KIZY, CSR-2466, RPR, CRR

23 Notary Public

24 Oakland County, Michigan

25 My commission expires 7-28-2019